

FILED
IN CLERKS OFFICE

UNITED STATES DISTRICT COURT 07
DISTRICT OF MASSACHUSETTS
U.S. DISTRICT COURT
UNDER SEALDISTRICT OF MASS.

UNITED STATES OF AMERICA)
)
)
v.) CRIMINAL NO. 13-10200-GAO
)
DZHOKHAR TSARNAEV)

DEFENDANT'S PROPOSED DIRECTIONS
TO THE JURY AT THE JURY VIEW

Defendant, Dzhokhar Tsarnaev, by and through counsel, hereby proposes that the jury's attention during the view of the boat be directed as follows:

1. Please note the temporary wood framing that once supported the shrink wrapping.
2. Please walk around the boat and observe the bullet holes and bullet indentations.
3. Please note the condition of the windshield of the boat.
4. Please observe the port (left) side of the boat toward the middle of the boat and note bloodstains, if any, you may see there.
5. Please observe the stern (back) side of the boat toward the left and note bloodstains, if any, you may see there.
6. Please visually scan the interior of the boat, and then focus on the engine block and spaces on either side of it. Please note the bloodstains, if any, which exist in and around the floor area on either side of the engine block.
7. Please note the areas of the boat where pieces of the interior have been cut out.

8. Please note the location of the head (bathroom) in the bow (front) portion of the boat and the location of items you see within it.

Respectfully Submitted,



/s/ Timothy Watkins

DAVID I. BRUCK

JUDY CLARKE

MIRIAM CONRAD

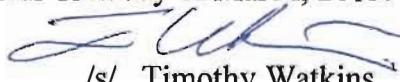
WILLIAM FICK

TIMOTHY WATKINS

Attorneys for Dzhokhar Tsarnaev

Certificate of Service

I hereby certify that I have caused this document to be sent to counsel for the United States by email and hand delivery this 13th day of March, 2015.



/s/ Timothy Watkins